

EXHIBIT ‘A’

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Edward P. Adams

Write the full name of each plaintiff or petitioner.

Case No. 21 CV 02675

-against-

CC.P.P., Riverbay Corporation NOTICE OF MOTION

Joel Lugo, Thomas Charles

Write the full name of each defendant or respondent.

Officers Wells, & Ahmed

PLEASE TAKE NOTICE that

plaintiff or defendant

name of party who is making the motion

requests that the Court:

Plaintiff

Edward Adams

Deny the Defendants Motion to Dismiss (See Attached File)

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☒ a memorandum of law
- ☒ my own declaration, affirmation, or affidavit
- ☒ the following additional documents:

11/19/21

Dated

Edward Adams

Name

140 Alcott Place

Address

201-331-6459

Telephone Number (if available)

Signature CJS

Prison Identification # (if incarcerated)

Bront

City

NY

State

10475

Zip Code

Edsping @ Gmail.com

E-mail Address (if available)

See Attached File

Attach additional pages and documents if necessary.

11/19/21

Executed on (date)

Edward Adams

Name

140 Alcott Place

Address

201-331-6459

Telephone Number (if available)



Signature

Prison Identification # (if incarcerated)

Bront NY 10475

City

State

Zip Code

Edsling@gmail.com

E-mail Address (if available)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Edward P. Adams

Fill in above the full name of each plaintiff or petitioner.

Case No. 21 CV 02675

CC P.D. Riverbay corporation -against-

Joel Lugo, Thomas Charles,
Officers Ahmed, officer
Wells

Fill in above the full name of each defendant or respondent.

DECLARATION

Opposition to Defendants motion to
dismiss.

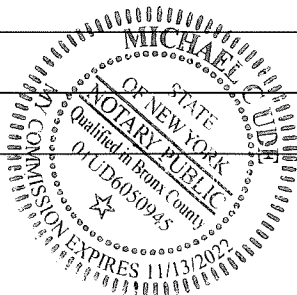
Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, Edward Adams, declare under penalty of perjury that the following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

See Attached File

11-19-2021



[Signature]
NOTARY

CC [Signature]
11/19/21

Revised 05/01 WDNY

AFFIDAVIT OF SERVICE(If you are having your signature notarized, use this form)UNITED STATES DISTRICT COURT
Southern DISTRICT OF NEW YORKPlaintiff(s), Edward Adams

v.

AFFIDAVIT OF SERVICE

21 -CV- 02475

C.C.P.O., Riverbay Corporation
 Defendant(s).
Joel Lugo Thomas Charles officers
Wells
E. Ahmed

STATE OF NEW YORK (US Southern District Court)
 COUNTY OF Bronx) ss.:

I, (print your name) Edward Adams, served a copy of the attached papers
 (state the name of your papers) opposition of defendant's
Motion to Dismiss

upon all other parties in this case

by mailing ☒ by hand-delivering ☐ (check the method you used)
 these documents to the following persons (list the names and addresses of the people you served)

Joseph A. Saccaro Jr.
Delonie A. Plummer

Jackson Lewis P.C.
44 South Broadway
White Plains, NY 10601

Attorneys For All Listed Defendants

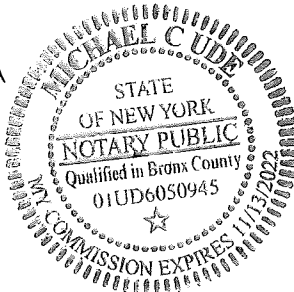
on (date service was made) 11/19/21

[Signature]
 (your signature)

Sworn to before me this 19th
 day of Nov 2021

[Signature]

Notary Public



Mail body: Opp

U.S. District Court
Southern District Of
New York
21-CV-02675

Edward Adams (Plaintiff)

Vs.

Defendants
Co-Op City Police Department.
Officers Joel Lugo ,
Thomas, Charles, Officer Wells,
Officer Ahmed, All Governed By
RiverBay Corporation

I've written a letter to u.s. district Court back on October 18 2021 regarding motioning for summary judgment against Co-Op City Police Unit. I then received a letter Filed On October 20th & 21st 2021 from U.S. District Court . The letter states A Discovery schedule hasn't been set. No initial Conference Hasn't taken place as of yet. Indicating pretrial management at this phase ,only NON- dispositive motions and settlement.

However on November 11th 2021 ,The Defendants Attorney have filed notice of appearance from their attorney . Their attorney has filed a motion to dismiss my Complaint 21-CV-02675. A motion to dismiss would be dispositive Motion. That would be a direct contradiction to the letter Addressed to me from The U.S. District Court Filed October 20th & 21st 2021

Being that I addressed the U.S. district Court on October 18th 2021 in regards to motioning for summary judgment. I Was then sent a response from U.S. District Court addressed to Plaintiff on file 21-CV-02675 (myself). The letter stating my file was referred to magistrate judge Barbera Moses with an "X" Marking Indicating pretrial discovery, non dispositive motions only at this present juncture in regards to my file 21-CV-02675 . The letter Addressed to me From U.S. District Court filed on October 21,2021.

Furthermore, If The Court Shall Seem Fit To Move Forward. As of Nov.18th, 2021. I Edward Adams would respectfully move for the U.S. District Court to deny they defendants motion to dismiss. For the foregoing reasons and all others discussed in The Plaintiff's Complaint (Myself) .The defendants present motion to dismiss should be denied.

U.S. District Court
Southern District Of
New York
21-CV-02675

Edward Adams (Plaintiff)

Vs.

Defendants
Co-Op City Police Department.
Officers Joel Lugo ,
Thomas, Charles, Officer Wells,
Officer Ahmed, All Governed By

RiverBay Corporation

Opposition To The Defendants Motion To Dismiss :

This Co-Op City Police Unit Violated My Rights in regards to They 4th Amendment the Fourth Amendment, the people have a right "to be secure in their persons, houses, papers and effects, against unreasonable searches and seizures." This right limits the power of the police to seize and search people, their property, and their homes.

Detective Joel Lugo Entered my home without a warrant in January Of 2018 while I wasn't home. Joel Lugo Entered my home without consent prior to they Bronx Supreme Court Indictment 444-2018 coming to fruition on March 12 ,2018.

It is upon my belief ,Co-Op City Detective Joel Lugo was so overzealous & entered my home without a warrant due to the nature of the alleged claims against myself made by they Complainant Of Bronx Supreme Court Indictment number 444 of 2018. These claims have led to Detective Joel Lugo And Co-Op City Police Department targeting me on quite a few frivolous cases. These frivolous claims have led to false imprisonment, injuries proven by medical report (Medical Record Number -2779888-11) , 20,000\$ in bail for Indictment 444-2018 which I was acquitted on , pain and suffering , and a smearing of my public record. The smearing of my public record and image with my community, as I am independent driver with my own clientele in my community. Potential Employers& Customers reluctant to hire me due to the nature of these falsified charges at behest of The Co-Op City Police Unit. All of said falsified claims which have been dismissed or disposed of due to lack of merit as of October 14, 2021.

Detective Joel Lugo Also Pointed A Firearm at my family at 140 Alcott Place Bronx , NY Apt 10D 10475 during the encounter in January Of 2018. I wasn't home In January Of 2018 and was away on business.. My 81 Year Old Grandmother whom uses an oxygen tank for breathing is willing to sign a sworn affidavit as to they Detective Joel Lugo's actions. As they Co-OP City Detective entered my home in January Of 2018. Just 2 Months prior to Bronx Supreme Court Indictment Number 444-2018 coming to fruition . My grandmother is willing to testify at a jury trial if the U.S. District Court deems proper. They warrant for Bronx Supreme Court Indictment number 444 of 2018 Was issued March 12, 2018. I Edward Adams Was Acquitted on All Counts by a Jury of 12 In Bronx Supreme Court On October 14th 2021 (Indictment Number 444 Of 2018). Trial Held October 4th- 14th 2021 in Bronx Supreme Court.

On March 25,2018 Joel Lugo Illegally Seized My Vehicle Although, the frivolous charges he tried to apply to me were false as to even the vehicle description in they actual complaint given by Complainant Quiara Hinestroza. This was an alleged reckless endangerment claim (Felony) that was debunked when the Complainant on the file gave a false statement of a Newer BMW Car that endangered her. Although I drove a Cadillac Escalade SUV at the time. The non factual biased claim debunked And Resulting in a Violation on November 8th 2018, docket number 2018Bx010678.

On docket number 2018Bx010678 Felony Reckless Endangerment claim. Detective Joel Lugo Illegally Searched & Seized my Cadillac Escalade after I was jumped by this Co-Op City Police Unit , including himself on a non driving arrest on foot in the vicinity Of 500 Baychester Avenue, Bronx NY 10475 on March 25th, 2018. The Bronx District Attorneys then returns they Escalade a month later after they March 25th, 2018 arrest. But initially applying a Felony Reckless endangerment claim that lacked merit. The Complaint and Charge was debunked , resulting in a Violation November 8th 2018 in Bronx Supreme Court. Docket number 2018Bx010678.

On March 26th 2018, They detective Joel Lugo & Co-Op City Police Department in attempt to smear my public record and image further . The corrupt Police Unit tried to apply a bogus "leaving the scene of an accident charge" of a parked car . When my Cadillac Escalade was legally parked and wasn't driving stating I hit a car that was Illegally parked in a crosswalk directly behind me. Docket Number 2018BX011507 dismissed on September 8th,2020 in Bronx Criminal Court .

In response to their motion to dismiss they March 20th 2020 Arrest No. B20609914 wasn't made by the Co-Op City Police Unit. But I Edward Adams Placed The 911 call to the Co-Op City Police Unit. By calling their public safety phone line 718- 671- 3050 On Said Day to simply inform them I've thrown a family friend out of my home for being belligerent. As I Edward Adams and The belligerent family friend were waiting outside my door for Co-Op City Police Department and NYPD to arrive. Being that the belligerent family friend was thrown out (by myself) at 140 Alcott Place Apartment 10D . I explain to they officers all CCPD whom first arrived the situation. Co-Op City Officer Wells Of the Co-Op City Police Unit whom is listed in my initial complaint to the U.S. District Court as A "John Doe officer". Officer Wells Enters my home without a warrant although the issue was now outside my door not in my home. The belligerent family member was "thrown out" not thrown in my home. As myself and the belligerent family member waited for NYPD to arrive. I Edward Adams informs they officer" You don't have consent to be in my

apartment, please step out". Officer Wells Then About Faced And Stood in my doorway aggressively posturing in an intimidating manner with 4 or so officers behind him. All of which on their own police Body cam. Notice the pattern of this Co-Op City Police Unit Again violating my rights in regards to they 4th amendment on March 20, 2020. Fourth Amendment, the people have a right "to be secure in their persons, houses, papers and effects, against unreasonable searches and seizures." This right limits the power of the police to seize and search people, their property, and their homes.

As me ,my family friend waited in front my doorway my mom and the NYPD arrived and I was arrested . The charge later dismissed. Which is in Bronx Criminal Court Record. Arrest No. B20609914 (initial desk ticket attached) *in original complaint - (21-cv-02675)*

I would respectfully and humbly ask of the court to use logic when rendering a decision on this matter as to denying their motion. Just based upon the nature and number of incidents with this Co-Op City Police Unit stated in my complaint.

Entering someone's home without a warrant is serious offense and violation of my civil rights. These officers need to be held accountable for pointing Guns At Someone's Family without a warrant. I would ask of the court to deny their motion to dismiss and they defendants in question be held accountable For their actions.

This Co-Op City Police unit could've killed me during the March 25th 2018 encounter Reference 27-CR-20-12646 State Vs Derek Chauvin. Mr. George Floyd Had Underlying health Conditions With guys knee on his neck which caused his death. My encounter with this unit on March 25th 2018 was about 6 officers on my neck and body while already cuffed . Scrapped skin off my face from a concrete street punched and kicked me And Officer Ahmed Pepper Sprayed Me. This assault on me carried out while I was already cuffed. Thankfully my heart and physique is an immaculate condition due my vigorous exercise routine or I would've suffered the same circumstances as George Floyd Or Eric Gardener. Eric Whom was choked to death back in 2014 on Staten Island after a prohibited chokehold was applied by Officer Daniel Pantaleo Of NYPD. Both of those gentleman arrested in their respective cases had underlying health conditions . I do not have any underlying health conditions which is why I was able to survive the almost deadly encounter with this Corrupt Police Unit On March 25th 2018 with It's officers in question .

Due to frivolous bias claims they've tried to apply to my name (Detective Joel Lugo) of Co-Op City Police Department as an example. This gentleman has been sued previously, per his police record . Along With Officer Thomas Charles (Co-Op City Police Department) whom has been sued previously as well. Officer Thomas Charles And Detective Joel Lugo's police records are Attached to this correspondence.

On March 25th 2018 they defendants jumped me in the Vacinity of 500 Baychester Avenue . Causing Injuries scrapes of skin off my face , kicked, punched and choked me . About 6-officers on top of my neck obstructing my breathing and assaulting me although I was already cuffed. I was then pepper sprayed by their Unit while already restrained as stated in my initial complaint. See Exhibit A for Medical Report.

This Co-Op City Police unit has been masquerading as a Real Police Unit. This Co-Op City Police Unit Got Exposed During The People Vs Edward Adams As Just what they are. They are in fact a private security force NOT REAL POLICE OR APART OF OUR BELOVED NYPD. They are not apart Of NYPD What so ever. Including Thomas Charles And Officer Pasquale Trial Day 1. Officer Pasquale is not apart of my complaint. They are a private security force , as stated on the record by they Co-Op Unit Unit themselves during the People Vs Edward Adams 2021 Bronx Supreme Court. I (Plaintiff of 21-CV-02675) Will turn over court minutes of The People Vs Edward Adams 2022 if discovery schedule deemed necessary by the U.S.District Court Southern district o New York.

Thomas Charles also states on the record in Bronx Supreme Court People Vs Edward Adams 2021 that he didn't arrest me On March 25 2018. I Edward Adams will pull the court minutes for they defendant Officer Thomas Charles. Thomas Charles whom in fact answered "no" when questioned during the trial People Vs Edward Adams 2021 in regards to arresting me on March 25th 2018. This response from Officer Thomas Charles was stated by the himself in a state trial on the record shows the dishonesty of this Co-Op City Police Unit.

The RiverBay Corporation that governs they officers should be held accountable as well. RiverBay has allowed these officers to operate with impunity. But this Co-Op City Got Exposed as A Private Security Force , Co-Op City Police Department Is Not Infact Real Police Unit. They are not by any means affiliated with NYPD. They are a just a private security force with minimal training . Basically a security guard. During The People Vs Edward Adams this CO-OP City Unit got exposed as In fact they are just a private security force masquerading as a real police force . They are not apart of NYPD what so ever. October 4th-14th 2021 ,in Bronx Supreme Court People Vs Edward Adams 2021. I was Acquitted on October 14th, 2021.

Medical Record In My (Exhibit A) Clearly Proves the Co-Op City Police Department dishonesty and corruption. Medical Report Clearly states brought to Emergency Room In Co-Op City Police Department Custody.

Thomas Charles Basically Committed Perjury implying he didn't arrest me on March 25th ,2018. The People Vs Edward Adams 2021. I will turnover the court minutes once a discovery schedule or initial conference is set by U.S. District Court.

Additionally, they Bronx District Attorneys Office Violated CPL 190.50 On March 12, 2018 By Indicting A Defendant On An Undisposed Felony Without The Right To Testify Clearly Violating State And Federal Law (Pertaining To What's in The Legislation (CPL.190.50) .

This warrant issued March 12 2018 was given to they Co-Op City Police Unit By the Bronx District Attorney.

As a show of good faith, I Respectfully state that CPL 190.50 adequately serves to separate defendants who sincerely wish to testify before a Grand Jury from those with no such intention . Matter Of Borrello v Balbach, 112 AD2d 1051, 1053 (1985) .

They officers don't want a trial because their are a corrupt security force masquerading as a real police unit . They are not NYPD What so ever. They CO-Op City Unit and RiverBay Corp. would want to dismiss my complaint and not stand trial so the facts won't come to light .

By the defendants number incidents stated in my initial complaint and severity of the claims . Along with they Co-OP City Security Forces actual public record. I've attached their records to this correspondence. As they didn't provide officer Joel Lugo's Record they notice of appearance they sent to me or the U.S. District Court .

As a show of Good Faith I have provided Joel Lugo's highly questionable Police record . I would respectfully move for the court to deny their motion to dismiss in favor of The Plaintiff or grant a jury trial As soon as possible. I'm willing to negotiate with defendants attorney for settlement if necessary.

Edward Adams
347-427-6227 (H)
201-331-6459 (C)
140 Alcott Place 10 D
Bronx, NY 10475



EXHIBIT 'A'

Medical Report
March 25 2018

31 Mar '21 0915

Page 1 of 2

Jacobi Medical Center
ED Triage Note

Patient Name: Adams, Edward EP/DIS-EP SMS: 1000020058841 MRN: 2779888
 DOB : 10/03/1983
 Age : 37Y Sex: M BMI: 22.60 Height: 190 cm. Weight: kgs
 Triage By : Shub, Robert, RN Test Date: 03/25/2018 1258

Chf Complaint: C0-Op City PD custody, reportedly was maced & tackled, has small bruise about right eyebrow

Triage Class : 3
 Assigned Area: Pink

Unscheduled ED Triage Note

Event Time: Sun, 25 Mar 18 1258

Status: complete

Sun, 25 Mar 18 1302

Pre-Notification?	: no
Arrival By	: Ambulance
ID Bracelet?	: ID bracelet is on, legible and correct
EMS Treatment	: NA
LOC	: alert
Preferred Language for Healthcare Information:	: English
Chief Complaint	: C0-Op City PD custody, reportedly was maced & tackled, has small bruise about right eyebrow
Onset Date/Time	: Sun, 25 Mar 2018
BP	: 112/75 mmHg
HR	: 88 bpm
RR	: 16
Temp	: 97.8 F (36.6 C) Route: oral
Pulse Ox	: 96 %
Height	: 190 cm (6'3", 75 in, 1.90 m) Method: patient states
Weight	: 81.6 kg (179 lbs 14 oz) patient states
BMI	: 22.60
GCS	: Total Glasgow Score: 15 GCS WNL: yes Eye Response: opens eyes spontaneously Motor Response: obeys commands Verbal Response: oriented
Pain	: 9
Objective	: Pt wiping his right brow with damp cloth
Past Med Hx	: none
Med Allergies	: no known medication allergies
Food Allergies	: Unable to obtain food allergy
Environmental Allergies	: Unable to obtain environmental
lergy	
Latex Allergy	: Unable to obtain latex allergy
Triage Interventions	: none

Wed, 31 Mar 21 0915

Page 1 of 5

Jacobi Medical Center
Chart Review Print

Location	Patient Name	Patient Number	Visit Number	Age	Sex
DIS-EP	Adams, Edward	2779888	2779888-11	37Y	M

Attending Physician

 Unscheduled ED Claiming the Patient
 Event Time: Sun, 25 Mar 18 1347

Status: complete

Sun, 25 Mar 18 1348 Documented by Thomas Riley, RN

Provider Start Date/Time: Sun, 25 Mar 2018 1347

Location : Pink

Attending : Denise McCormack, MD

Provider : Jenny Zhao, MD

Nurse : Thomas Riley, RN

ID Bracelet? : ID bracelet is on, legible and correct

Docket # 21 CV 02675

Wed, 31 Mar 21 0915

Page 2 of 5

Jacobi Medical Center
Chart Review Print

Location	Patient Name	Patient Number	Visit Number	Age	Sex
DIS-EP	Adams, Edward	2779888	2779888-11	37Y	M

Attending Physician-----
Unscheduled Emergency Triage - Adult Secondary Note

Event Time: Sun, 25 Mar 18 1348

Status: complete

Sun, 25 Mar 18 1348 Documented by Thomas Riley, RN

Presentation Time : Sun, 25 Mar 2018

1348

Physician : Jenny Zhao, MD

Registered Nurse : Thomas Riley, RN

Patient Location : Pink

Responsive/LOC : alert

Vital Signs/Pain :

Height : 190 cm (6'3", 75 in, 1.90 m) Method: patient states

Respiratory Screen : not exposed

Fever: no

Cough: no

Chest Pain:

no Recent

Travel: no

Additional Interventions : assessments

Morse Fall Scale :

History of Falling : no

Secondary Diagnosis: no

Ambulatory Aid : none/bed rest/nurse assist

IV Access : no

Gait : normal/bedrest/immobile

Mental Status : knows own limits

Total Score : 0

Risk Level : No risk: Good basic nursing care

Bed Alarm On : no

Cont Nurse Notes : Therapy:assessments

Date/Time:Sun, 25

Mar 2018 1348

Wed, 31 Mar 21 0915

Page 3 of 5

Jacobi Medical Center
Chart Review Print

<u>Location</u>	<u>Patient Name</u>	<u>Patient Number</u>	<u>Visit Number</u>	<u>Age</u>	<u>Sex</u>
DIS-EP	Adams, Edward	2779888	2779888-11	37Y	M

Attending Physician-----
Unscheduled ED RN Progress Note

Event Time: Sun, 25 Mar 18 1349

Status: complete

Sun, 25 Mar 18 1350 Documented by Thomas Riley, RN

Note : Patient is a 34 year old male who came to the ED due pain s/p being maced and tackled by police. Patient alert and orientated to person, place, and time; breathing unlabored; skin is warm and dry - color is good. Patient placed in stretcher and given comfort measures. MD evaluation in progress. Awaiting further instructions.

Wed, 31 Mar 21 0915

Page 4 of 5

Jacobi Medical Center
Chart Review Print

Location	Patient Name	Patient Number	Visit Number	Age	Sex
DIS-EP	Adams, Edward	2779888	2779888-11	37Y	M

Attending Physician-----
Unscheduled ED Provider Initial Note

Event Time: Sun, 25 Mar 18 1358

Status: complete

Sun, 25 Mar 18 1947 Documented by Denise McCormack, MD

Source of History : Patient;
 Time Pt Seen :
 Attending : Denise McCormack, MD
 Provider : Jenny Zhao, MD
 Nursing Note Reviewed: Nursing note reviewed.
 HPI/Exam/Assm't/Plan :

SOURCE: patientCC: abrasion, mace to faceHPI:

34 y o m denies pmhx comes to the ED in police custody after being tackled and had mace sprayed in the face. Endorsing some burning to R eye but denies any foreign body sensation/visual changes. W rare abrasions over bilat hands, L cheek, and R eyebrow, and R knee. Denies any loc/neck pain/n/v/numbness/weakness/cp/sob/abd pain. Denies any other injuries. Ambulatory following incident. Denies etoh/other substance use. Denies any si/hi.

REVIEW OF SYSTEMS:

All other ROS otherwise negative.

PMH:

No PMH.

PSH:

Non-contributory

PHYSICAL EXAM:VITAL SIGNS:

VSS

General: pleasant, cooperative, and well appearing. In no apparent distress.

HEENT: No cervical LAD.

Cor: regular rate and regular rhythm.

Wed, 31 Mar 21 0915

Page 5 of 5

Jacobi Medical Center
Chart Review Print

Location	Patient Name	Patient Number	Visit Number	Age	Sex
DIS-EP	Adams, Edward	2779888	2779888-11	37Y	M

Attending Physician-----
Unscheduled ED Provider Initial Note -- cont'd

Pulm: Bilateral clear lungs. Good air movement. regular.
 GI: soft, non-tender, and non-distended.
 Back: No cervical tenderness, thoracic tenderness, or lumbosacral tenderness.
 Neuro: alert, face symmetric, steady gait, and normal sensorium. Oriented x3. No gross motor deficits.
 Skin: very superficial abrasions over bilat hands, able to make fist, fully extend all fingers, no tenderness/swelling/deformity. L knee w/ abrasion, hemostatic, full active ROM, no swelling/deformity/patellar tenderness/prox tibial tenderness. L cheek w/ abrasion, hemostatic. r eyebrow w/ small abrasion, hemostatic, nontender to palpation. No facial swelling/deformity/bony tenderness.
 Additional: r eye w/ mild conjunctival erythema.

ASSESSMENT AND PLAN:

34 y o m denies pmhx comes to the ED in police custody after being tackled and had mace sprayed in the face. VSS no focal neuro deficits, pt requesting a&D ointment for his abrasions, in nad. Do not suspect bony injury or foreign body/corneal abrasion.
 -bacitracin/a&D ointment applied
 -tdap
 -instructed to flush eyes out w/ water as needed for mace

Attending Attestation: Patient seen and examined by me. I fully agree with the provider's assessment, plan and procedures.

Unscheduled ED Patient Exit

Event Time: Sun, 25 Mar 18 1642

Status: complete

Sun, 25 Mar 18 1643 Documented by Lauren Kealy, RN

Transport Time : Sun, 25 Mar 2018 1642

Undo Last Pt Exit: No

Comment : pt DCed home by MD in no acute distress in police custody

* * * End of Report * * *

EXHIBIT 'B'

detectives &
officers Records



OFFICE OF THE DISTRICT ATTORNEY, Bronx County

Darcel D. Clark
District Attorney

198 East 161st Street
Bronx, NY 10451

718.838.7348
Fax: 718.590.6790

November 19, 2019

Re: **PEOPLE v. EDWARD ADAMS AKA ADAM EDWARDS**
Indictment Number: 444/2018

DISCLOSURE

In the early-mid 2000s, Detective Monahan had his shield stolen and lost a day of vacation.

In 2008, Sgt Joel Lugo was warned and admonished for lateness.

In 2012, Sgt Lugo was suspended for two days for smoking in uniform.

In 2016, Sgt Lugo was placed on leave for two weeks for making threatening statements toward his partner.

Sgt Lugo informed the undersigned that he was a named Defendant in a lawsuit alleging false arrest for an incident where he issued a trespass summons and that he believed the plaintiff's name to be Jose Vera. The undersigned will attempt to locate corresponding documentation and will turn it over if and when it comes into the People's possession.

Sgt Lugo informed the undersigned that he was a named Defendant in a lawsuit alleging false arrest for an incident where the charge was criminal trespass and that he believed the plaintiff's name to be Robert Ferebee. The undersigned will attempt to locate corresponding documentation and will turn it over if and when it comes into the People's possession.

Sgt Lugo informed the undersigned that over ten years ago, he was a Defendant in a personal law suit filed by a family member, a judgment was issued against him, and he has not yet paid the judgment.

Sgt Lugo informed the undersigned that a bank brought a lawsuit against him regarding repayment of a loan, however, the loan has now been paid off.

Sincerely,

JENNIFER E. SEEBA
Assistant District Attorney



OFFICE OF THE DISTRICT ATTORNEY, Bronx County

Darcel D. Clark
District Attorney

198 East 161st Street
Bronx, NY 10451

718.838.7348
Fax: 718.590.6790

August 1, 2019

Re: **PEOPLE v. EDWARD ADAMS AKA ADAM EDWARDS**
Indictment Number: 444/2018
Court Part: 96
Adjourn Date: August 6, 2019

DISCLOSURE

PO Kendrick Wells, Shield #2636, of CCPD received a Command Discipline for not wearing his seatbelt and lost 5 days of vacation.

PO Christopher Garrio, Shield #2491, of CCPD received a Command Discipline for calling out sick too late and was warned and admonished.

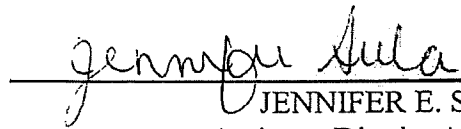
PO Garrio also informed the undersigned that he is a named Defendant in a lawsuit. The undersigned has requested additional information and will provide it to Defense upon receipt.

In 2013, PO Charles Thomas, Shield #1798, of CCPD received a Command Discipline for calling out sick too late and was warned and admonished.

In 2016, PO Thomas received a Command Discipline for losing his ID and lost one day of vacation.

PO Thomas also informed the undersigned that he is a named Defendant in a lawsuit. The undersigned has requested additional information and will provide it to Defense upon receipt.

Sincerely,


JENNIFER E. SEEBA
Assistant District Attorney
Investigations Division
Criminal Enterprise Bureau
(718) 838-6152